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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KENDALL LOVELL, an individual,

Plaintiffs,

vs.

**USAA CASUALTY INSURANCE
COMPANY**; and DOES I through X,
inclusive; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

Case No.: 2:24-cv-01024-CDS-BNW

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

(FIRST REQUEST)

Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-3, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the discovery deadlines in the operative discovery plan [ECF No. 22], as set forth below.

A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery has been completed:

1. The parties have served initial disclosures pursuant to FRCP 26(a)(1).
2. Plaintiff has propounded written discovery on Defendant.
3. Defendants have propounded written discovery on Plaintiff.
4. Plaintiff has answered Defendant's discovery.
5. Defendant has answered Plaintiff's written discovery requests.

6. The deposition of Plaintiff took place on November 6, 2024.

7. Mediation is scheduled for December 12, 2024.

B. Pursuant to LR 26-3(b), the parties stipulate that they need to complete the following discovery:

1. Deposition of percipient witnesses;
2. Depositions of Plaintiff's medical providers;
3. Depositions of the parties' expert witnesses; and
4. Any other potential depositions or written discovery which may become necessary as discovery continues.

C. Pursuant to LR 26-3(c), the parties stipulate an extension is needed for the following reasons:

The parties have scheduled a private mediation on December 12, 2024. The parties have agreed to extend discovery deadlines by 60 days to accommodate focusing resources on the mediation instead of expert costs. This is the parties first request for an extension.

No party will be prejudiced by the extension, and the requested extension is made in good faith and not for purposes of delay. Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the deadline by sixty (60) days in accordance with the requested amended discovery deadlines.

D. Pursuant to LR 26-3(d), the parties stipulate to the following proposed schedule for completing all remaining discovery:

The parties agree to extend all the discovery deadlines in this case by sixty (60) days, as set forth below:

Event	Current Deadline (ECF No. 22)	Proposed Deadline
Motion to amend pleadings and add parties	12/20/24	02/19/25
Initial expert disclosures	01/17/25	03/18/25
Rebuttal expert disclosures	02/18/25	04/18/25
Discovery cut-off	03/20/25	05/19/25
Dispositive Motions	04/21/25	06/20/25
Joint Pre-Trial Order	05/21/25	07/21/25

E. Current Trial Date

A trial date has not been set.

This request is made in good faith and not for the purpose of delay.

Dated this 26th day of November, 2024.

Dated this 26th day of November, 2024.

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ORDER

IT IS SO ORDERED.

Dated: November 27, 2024


UNITED STATES MAGISTRATE JUDGE